Law Offices

JOHN C. LANE

48 Woodport Road, Suite 1 Sparta, New Jersey 07871 973-512-3244 Fax: 973-512-3245 www.thelanelawfirm.com

John C. Lane Admitted in NJ, NY & VA

Admitted in NJ & NY

Peter C. Bobchin

Jennifer L. Enberg Paralegal

New York Office:

30 Wall Street 8th Floor New York, NY 10005 212-363-8048

Reply to: NJ

March 12, 2020

Via ECF

Hon. Mary Kay Vyskocil United States District Judge **United States District Court** Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street, New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 3/12/2020

Delia Lopez v. Star Leasing Company, et al., S.D.N.Y., Re: 19 Civ. 10810 (MKV)

JOINT REQUEST TO ADJOURN INITIAL PRETRIAL CONFERENCE

Dear Judge Vyskocil:

I represent defendant Star Leasing Company in this matter. I write to request a short adjournment of the Initial Pretrial Conference for two weeks, from March 17 to March 31, 2020, or any day thereafter in that week. The reason for the request is to accommodate counsel's schedules. Mr. Pinkhasov, who joins me in this request, advises that he will be on trial. For my part, I have just been scheduled for an urgent meeting of clients involved in the transportation industry in preparation for a very serious case in Pennsylvania. The meeting itself was moved to March 17 to accommodate all of the participants, some of whom are located in the southwest United States, others in London. The case is subject to a mediation in Philadelphia on March 23, 2020. I was brought into the case, now seven years old, just two weeks ago.

Mr. Pinkhasov and I have filed our Joint Letter, which lays out the parties and circumstances. With the additional time, we hope that I can assist plaintiff's counsel to identify the correct defendant.

Case 1:19-cv-10810-MKV Document 9 Filed 03/12/20 Page 2 of 2

Hon. Mary Kay Vyskocil, U.S.D.J. March 12, 2020 Page 2 Law Offices

John C. Lane

If so, he will wish to amend the complaint. My ultimate goal is for plaintiff to dismiss the complaint as to my client, Star Leasing Company. If this request is granted, Mr. Pinkhasov and I will take steps in that direction, which should benefit the parties and the Court. We thank Your Honor for your kind consideration.

Respectfully,

John C. Lane

JCL:jle

cc: Daniel Pinkhasov, Esq., via ECF

GRANTED. The Initial Pretrial Conference previously scheduled for March 17 is rescheduled for April 1, 2020 at 2:30PM. The Parties should update the Court no later than March 27 as to whether the Plaintiff intends to amend her complaint. SO ORDERED.

Date: 3/12/2020 New York, New York

United States District Judge